

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

This document applies to:

ETHICON WAVE 10 CASES LISTED IN
PLAINTIFFS' EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT
JUDGE

**NOTICE OF ADOPTION OF WAVE 3 *DAUBERT* RESPONSE REGARDING
GREGORY T. BALES, M.D. FOR WAVE 10**

Plaintiffs filed a Notice of Adoption (Dkt. 7969) as to the opinion testimony of Gregory T. Bales, M.D in the Wave 10 cases identified in Exhibit A to their Notice.

In response, Defendants hereby adopt and incorporate by reference the *Daubert* response filed in relation to the general-causation opinions of Gregory T. Bales, M.D. for Ethicon Wave 3 (Dkt. 2914) as their response for the Wave 10. Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 3 response briefing.

Respectfully submitted,

/s/ William M. Gage

William M. Gage (MS Bar #8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson

Susan M. Robinson (W. Va. Bar #5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824

Charleston, WV 24338

(304) 414-1800

srobinson@tcspllc.com

Counsel for Defendants

Ethicon, Inc. and Johnson & Johnson

CERTIFICATE OF SERVICE

I hereby certify that on this day, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

William M. Gage